



**Verizon Wireless**  
1300 I Street, NW  
Suite 400 West  
Washington, DC 20005

December 7, 2001

**VIA ELECTRONIC FILING**

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 – 12th Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

Re: *Notice of Ex Parte Presentation, Verizon Wireless*  
*Rural Interconnection*  
*CC Dockets 01-92 and 96-98*  
*WT Docket 01-316*

Dear Ms. Salas:

This is to advise you that, on December 7, 2001, I had an ex parte meeting with Tamara Preiss, Chief, Competitive Pricing Division, Common Carrier Bureau; Thomas Navin, Deputy Chief, Policy Division, Wireless Telecommunications Bureau; Steve Morris of the Competitive Pricing Division; and Gregory Vadas, Eli Johnson, and Stacy Jordan of the Wireless Telecommunications Bureau.

The issues discussed in the meeting related to a number of interconnection disputes that have arisen across the country between rural local exchange carriers and wireless carriers. We discussed briefly the recent orders released by the Iowa Utilities Board and the Cole County Missouri Circuit Court relating to proposed wireless traffic termination tariffs. We also discussed the complaint filed by Mid-Rivers Telephone Cooperative against Verizon Wireless in Federal District Court in Montana seeking retroactive access compensation for termination of local wireless traffic, and a similar appeal pending at the 9th Circuit Court of Appeals (3 Rivers Telephone Cooperative, Inc. v. U.S. West Communications, Inc.). I provided copies of each of these documents to the meeting participants.

The purpose of the meeting was to urge the FCC to provide clarification of the rules that should govern rural/wireless carrier interconnection. As the disputes in Iowa, Montana and Missouri demonstrate, there is a wide gulf in understanding and interpretation of the interconnection rules between wireless and rural carriers and these disputes are impeding

successful contract negotiations. I identified some of the key issues in dispute in these state cases, including: the application of the “intra-MTA” rule for purposes of determining which traffic is subject to reciprocal compensation; the obligation of LECs to transit traffic; the method for determining the appropriate transiting rate; liability for historical compensation in the absence of an interconnection agreement or a local termination tariff; and the applicability of federal interconnection rules to the review of state tariffs.

This notice is provided pursuant to Section 1.1206 of the Commission’s rules, and is being filed electronically.

Very truly yours,

/s/  
Anne E. Hoskins

cc: Tamara Preiss  
Thomas J. Navin  
Gregory R. Vadas  
Stacy Jordan  
Eli Johnson  
Steve Morris